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May 21, 2021

U.S. Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

Reference: Oregon State University TRIGA Reactor (OSTR) Docket No. 50-243, License No. R-106

Subject: Amendment to letter dated June 17, 2020, License Amendment Request to Remove Technical Specification Requirements related to Instrumented Fuel Elements and Return from Pulsing Preclusion, as well as Requested Administrative/Grammatical Changes

Commission:

This letter serves as an amendment to "Attachment A – Corrections to Tech Specs" of the license amendment request letter submitted on June 17, 2020. That letter requested a license amendment for the purpose of modifying the existing technical specifications (TS) to remove requirements related to Instrumented Fuel Elements (IFE) and a return from pulsing preclusion, as well as administrative/grammatical changes.

Attachment A, Section 3, #30 (page 13), states:

3.2.2, Table 1 Footnote (1): Change "Any single Linear Power Level, Log Power Level or Power Level measuring channel may be inoperable while the reactor is operating for the purpose of performing a channel check, test, or calibration" to "Any of the measuring channels listed in Table 1 may be inoperable while the reactor is operating for the purpose of performing a channel check, test, or calibration on the inoperable channel(s)".

Basis: Since the linear and log channels get their signal from the same fission chamber, this exception needs to apply to both channels simultaneously.

We suggest replacing this with:

3.2.2, Table 1 Footnote (1): Change "Any single Linear Power Level, Log Power Level or Power Level measuring channel may be inoperable while the reactor is operating for the purpose of performing a channel check, test, or calibration" to "Any measuring channel listed in Table 1 may be inoperable while the reactor is operating for the purpose of performing a channel check, test, or calibration. Note that the Linear Power Level and Log Power Level are connected to the same channel and both become inoperable when performing a channel check, test, or calibration."

Basis: Since the linear and log channels get their signal from the same fission chamber, this exception needs to apply to both channels simultaneously.

Furthermore, in the interest of clarity, we propose replacing the language in Footnote (1) in Table 2 in TS Section 3.2.3:

(1) "Any single Linear Power Level, Log Power Level or Power Level safety channel may be inoperable while the reactor is operating for the purpose of performing a channel check, test, or calibration."

With the following:

(1) "Any single safety system may be inoperable while the reactor is operating for the purpose of performing a channel check, test, or calibration."

Basis: These are systems, not channels. There is also no need to call the individual systems out in the footnote.

I hereby affirm, state, and declare under penalty of perjury that the foregoing is true and correct.

Executed on: <u>5/21/21</u>.....

If you have any questions, please do not hesitate to contact me.

Sincerely,

Robert Schickler Assistant Director/Reactor Administrator

cc: Kevin Roche, USNRC Dr. Irem Tumer, OSU Dan Harlan, OSU Steve Reese, OSU Maxwell Woods, ODOE